

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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In re)	Chapter 11
)	
TELEGLOBE COMMUNICATIONS CORPORATION, <i>et al.</i> ,)	Jointly Administered
)	Bankr. Case No. 02-11518 (MFW)
Debtors.)	
-----	x	
TELEGLOBE COMMUNICATIONS CORPORATION, <i>et al.</i> ,)	
)	C.A. No. 04-CV-1266 (SLR)
Plaintiffs,)	
)	REDACTED - PUBLIC VERSION
v.)	
)	
BCE INC., <i>et al.</i> ,)	
)	
Defendants.)	
-----	x	

**TRANSMITTAL AFFIDAVIT OF ANNE SHEA GAZA IN
SUPPORT OF PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS'
MOTION *IN LIMINE* TO EXCLUDE THE EXPERT TESTIMONY OF PAUL
CHARNETZKI AND CARLYN TAYLOR AS A SANCTION FOR THE SPOILIATION
OF INFORMATION CONSIDERED IN FORMING THEIR OPINIONS**

I, Anne Shea Gaza, after being duly sworn upon oath, depose and state as follows:

1. I am an attorney with the law firm of Richards, Layton & Finger, counsel representing Plaintiffs in the above-captioned action.
2. I am admitted to practice before this Court.
3. This Affidavit is submitted in support of Plaintiffs' Memorandum In Opposition To Defendants' Motion *In Limine* To Exclude The Expert Testimony Of Paul Charnetzki And Carlyn Taylor As A Sanction For The Spoliation Of Information Considered In Forming Their Opinions.
4. Attached to this Affidavit as **Exhibit 1** is a true and correct copy of deposition excerpts from the Deposition of Paul Charnetzki, dated May 3, 2006.

5. Attached to this Affidavit as Exhibit 2 is a true and correct copy of deposition excerpts from the Deposition of Walda Roseman, dated May 5, 2006.

6. Attached to this Affidavit as Exhibit 3 is a true and correct copy of deposition excerpts from the Deposition of Carlyn Taylor, dated May 9, 2006.

7. Attached to this Affidavit as Exhibit 4 is a true and correct copy of deposition excerpts from the Deposition of Ian Fisher, dated May 1, 2006.

8. Attached to this Affidavit as Exhibit 5 is a true and correct copy of Paul Charnetzki Deposition Exhibit 1.

9. Attached to this Affidavit as Exhibit 6 is a true and correct copy of Carlyn Taylor Deposition Exhibit 1.

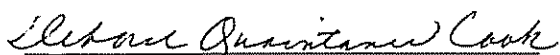
10. Attached to this Affidavit as Exhibit 7 is a true and correct copy of deposition excerpts from the Deposition of Joshua Livnat, dated May 4, 2006.

11. Attached to this Affidavit as Exhibit 8 is a true and correct copy of deposition excerpts from the Deposition of Linda McLaughlin, dated May 2, 2006.

Dated: May 31, 2006


Anne Shea Gaza (#4093)

SUBSCRIBED and sworn to before me this
31st day of May, 2006


Notary Public

DEBORAH QUAINANCE COOK
Notary Public - State of Delaware
My Comm. Expires May 9, 2007